

Magistrate Judge Paula L. McCandlis

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

JACOB D. LITTLE,
Defendant.

NO. MJ20-577

COMPLAINT for VIOLATION

Title 18, United States Code, Section 922(j)

BEFORE, The Honorable Paula L. McCandlis, United States Magistrate Judge, United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE
(Possession of a Stolen Firearm)

On or about May 30, 2020, in King County, in the Western District of Washington, the Defendant, JACOB D. LITTLE, knowingly possessed a stolen firearm, to wit, one Colt M4 rifle with a suppressor, bearing serial number LE296517, which had been shipped and transported in interstate or foreign commerce, knowing and having reasonable cause to believe the firearm was stolen.

All in violation of Title 18, United States Code, Section 922(j).

AFFIANT'S BACKGROUND

1
2 1. I am a Special Agent duly sworn and employed by the U.S. Department of
3 Justice Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). I am currently
4 assigned to the Seattle V ATF Field Office, located within the Seattle, Washington, Field
5 Division. I have been employed as a special agent since July 2017.

6 2. I am a graduate of Western Oregon University in Monmouth, Oregon,
7 where I received a Bachelor of Science in Computer Science and a Bachelor of Science
8 in Criminal Justice. I completed a twelve-week Criminal Investigator Training Program
9 and a fifteen-week Special Agent Basic Training at the ATF National Academy/Federal
10 Law Enforcement Training Center in Glynco, Georgia.

11 3. I am responsible for investigations involving specified unlawful activities,
12 to include violent crimes involving firearms that occur in the Western District of
13 Washington. I am also responsible for enforcing federal firearms and explosives laws
14 and related statutes in the Western District of Washington. I received training on the
15 proper investigative techniques for these violations, including the identification of
16 firearms and location of the firearms' manufacture. I have actively participated in
17 investigations of criminal activity, including but not limited to: crimes against property,
18 narcotics-related crimes, and crimes involving the possession, use, theft, or transfer of
19 firearms. During these investigations, I have also participated in the execution of search
20 warrants and the seizure of evidence indicating the commission of criminal violations.

21 4. This Affidavit is made based upon my personal knowledge, training,
22 experience and investigation, as well as upon information provided to me and my review
23 of reports prepared by other law enforcement personnel. This Affidavit is made for the
24 purpose of establishing probable cause for this Complaint and thus does not include each
25 and every fact known to me concerning this investigation.

SUMMARY OF PROBABLE CAUSE

26
27 5. On May 30, 2020, Seattle Police Department (SPD) officers were deployed
28 to work demonstration management/crowd control in the area of 6th Avenue and Pine

1 Street in Seattle, Washington, where large groups were gathering to protest the death of
2 George Floyd. Upon arrival in the area, three SPD officers (Washington, Behn, and
3 Spect) parked SPD vehicle #33411, a blue Ford SUV, in the 1600 block of 6th Avenue on
4 the west side of the street in front of the Nordstrom store.

5 6. Also on May 30, 2020, members of the SPD Photo Unit were assigned to
6 assist with the protests by documenting protestors that were committing crimes or acting
7 in a suspicious manner. They responded in the area of 6th Avenue and Pine Street. At one
8 point, overwhelmed by the protestors, they left their parked vehicle and took refuge in the
9 Nordstrom store located at 500 Pine Street. From there, they took numerous photos from
10 an elevated position.

11 7. At approximately, 3:30 p.m., civil unrest began to occur in a concentrated
12 area, 4th Avenue to 6th Avenue and Olive Way to Pike Street. This included the
13 destruction of five SPD vehicles that were parked in the 1600 block of 6th Avenue and
14 one additional SPD vehicle that was parked in the 500 block of Pine Street. These SPD
15 vehicles were heavily damaged by protestors. This destruction included breaking off the
16 windshield wipers, side view mirrors breaking out the vehicle windows with rocks and
17 poles, and removing various equipment, to include video recording equipment, ballistic
18 helmets, uniforms emergency medical equipment, fire extinguishers and a total of five
19 firearms.

20 8. Utilizing surveillance video, photos, and witnesses, SPD investigators
21 identified descriptions of each individual that stole five firearms from the SPD vehicles.
22 Three of the firearms have since been recovered. One stolen rifle and one stolen pistol
23 have not been recovered. The subject of this search warrant is the recovery of the stolen
24 SPD-issued rifle, which is a loaded Colt M4 rifle with a suppressor, bearing serial
25 number LE296517 (hereinafter "the Colt rifle and suppressor"), that was removed from
26 SPD vehicle #33411.

27 9. On June 8, 2020, investigators reviewed several photographs taken by SPD
28 Photographer Derby. In the course of reviewing these photos, investigators observed

1 several photographs depicting a heavysset adult white male dressed in all black, including
2 black rain slicker and black face covering, and wearing a black backpack. The
3 photographs showed that the male was carrying a large, rectangular shaped bag.
4 Investigators recognized this bag as looking identical to the rifle bags that are issued by
5 the SPD Firearm Unit and carried by the SPD officers and detectives that are trained to
6 carry either an AR-15/M4 rifle or shotgun.



19 *SPD Photographer Derby's photographs of suspect taken on May 30,*
20 *2020, around 4:21 p.m.*

21 10. Investigators further observed that these images showed the heavysset white
22 male walking on the east sidewalk in the 1600 block of 6th Avenue. Investigators further
23 observed from the images that the individual was carrying the bag in a manner that
24 indicated the bag had a heavy object inside it. From training and experience,
25 investigators observed that the shape of the bag was consistent with it containing a rifle
26 with a loaded magazine. Investigators also observed that several images appeared to
27 show a white-colored powder on the exterior of the bag that was consistent with residue
28 from a fire extinguisher. Investigators were aware that fire extinguishers had been stolen

1 by the protesters while damaging the police vehicles and sprayed throughout the vehicles
2 parked in the 1600 block of 6th Avenue to further damage the interior of the police
3 vehicles.

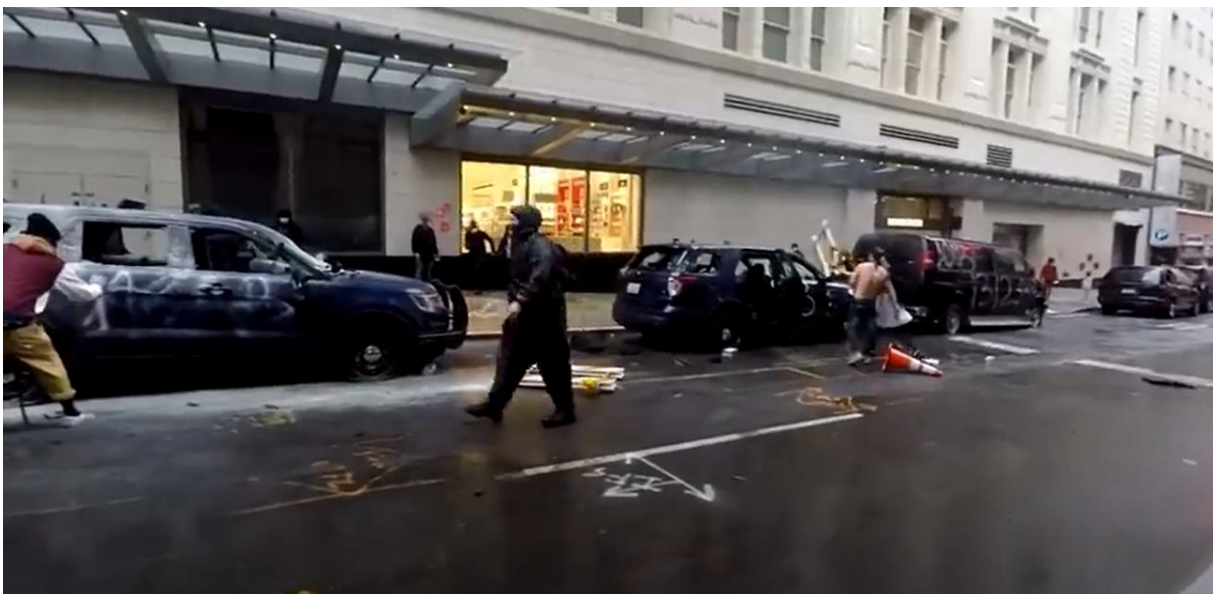
4 11. After viewing these photographs, Investigators spoke to SPD Officer Q.
5 Washington, who was one of the officers who had traveled to the scene in SPD vehicle
6 #33411 and secured two firearms, including the Colt rifle, in the rear portion of the
7 vehicle. Officer Washington confirmed that her Colt rifle, which had been inside the
8 department-issued rifle bag, had been taken from vehicle #33411 at some point on May
9 30, 2020, and had not yet been recovered. Officer Washington was shown the
10 photographs above and confirmed that the bag in the photographs appeared consistent
11 with the department-issued rifle bag that she had used to carry her Colt rifle.

12 12. On June 15, 2020, investigators located a video that had been posted to
13 YouTube by a user named "Vagrant Holiday" titled "Riot Holiday." Upon reviewing the
14 video, and listening to the narration of the individual filming the video, investigators
15 recognized the video as containing footage of the rioting and looting that occurred in
16 Seattle on May 30, 2020. Investigators saw the video had been posted on June 13, 2020.
17 Approximately two minutes into the video, investigators saw what appeared to be the
18 above-described heavysset adult white male dressed in all black wearing a black backpack
19 in the area of 6th and Pine, in front of the Nordstrom department store. As shown in the
20 screenshots below, the video appeared to show this male removing the rifle bag from the
21 rear of a SPD vehicle and walking off with it.

22 13. From the video, investigators recognized the three police vehicles parked in
23 a row as vehicles damaged during the May 30, 2020, protests. Investigators were aware
24 that two SPD unmarked SUV units were parked behind a black Chevy police van, and
25 that the second SUV unit in the row was SPD vehicle #33411. While watching the video,
26 investigators saw footage of the adult male removing what appeared to be a SPD-issued
27 rifle bag from the rear portion of what appeared to be SPD vehicle #33411.
28



Screenshot from "Riot Holiday" YouTube video, time elapsed 2:01 – Close up of suspect walking on 6th Avenue in front of Nordstrom store.



Riot Holiday, Time elapsed 2:02 - Suspect walking towards SPD vehicle #33411



Riot Holiday, time elapsed 2:08 – Suspect about to remove rifle bag through broken rear window of SPD vehicle #33411

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Riot Holiday, time elapsed 2:08 – Suspect removing rifle bag from broken rear window



Riot Holiday, time elapsed 2:10 – Suspect clutching rifle bag

14. From the video, investigators also saw that the male appeared to react to the weight of the rifle bag hitting his leg by bending over slightly.

15. On June 30, 2020, investigators learned that SPD had received a tip, dated June 2, 2020, from the Snohomish County Sheriff's Office (SCSO) that identified a video that had been posted to the Snapchat account "yg_jacob" that showed a heavysset adult white male dressed in all black smashing the front window of a police vehicle using a laptop computer at what appeared to be 1600 block of 6th Avenue on Saturday, May 30, 2020. The video also included a photo of the male posing in front of an SPD vehicle that had been spray-painted with red paint at what appeared to be the 500 block of Pine Street. The tip listed the subject as "Jake Little," an employee of Judd & Black in Everett, Washington. Investigators compared the individual featured in the Snapchat video to the images he had previously obtained from the SPD Photo Unit and YouTube video of the unidentified heavysset adult male suspect who had removed what appeared to be a rifle bag from SPD vehicle #33411. Based upon the heavysset build and clothing worn, investigators concluded that they appeared to depict the same individual.



Left: "yg_jacob" Snapchat photo. Right: photo taken by SPD Photo Unit

1 16. Based upon the tip that the individual in the above photo posted to “yg-
2 jacob” was named “Jake Little,” Analyst Ross queried law enforcement and open source
3 databases for individuals named “Jake” or “Jacob” in the Snohomish County area.
4 Analyst Ross located a Facebook account for “Jacob YG Little” that depicted an
5 individual that appeared to match the suspect’s build and description. He tentatively
6 identified “Jake Little” as JACOB D. LITTLE. He also found two vehicles identified as
7 being registered to LITTLE: a 2001 black Chevy Impala, and a 2005 Cadillac Deville.

8 17. On June 30, 2020, investigators spoke with the tipster. They learned from
9 the tipster that “Jake Little” lived in Everett, Washington. The tipster described “Jake
10 Little” as a physically large, over six feet tall and well over 300 pounds. The tipster
11 believed that “Jake Little” believed he is a gangster. The tipster said “Jake Little” is
12 always armed with a pistol and possibly a rifle or a shotgun. The tipster said they saw the
13 Snapchat post that “Jake Little” had made and posted with disbelief and forwarded the
14 information to SCSO. The tipster said they immediately recognized “Jake Little” in the
15 video by the Snapchat account “yg_jacob” because of his physical size and because it
16 was something that he would post. The tipster said “Jake Little” disliked the police and
17 showed support for the Black Lives Matter (BLM) movement. The roommate of the
18 tipster also spoke with Detective Magan. The roommate told Detective Magan that “Jake
19 Little” drove a 2001 black colored Chevrolet Impala. The roommate also said that “Jake
20 Little” was employed at Cintas Janitorial in Everett, in addition to working at Judd and
21 Black.

22 18. Also on June 30, 2020, investigators learned that LITTLE was recently
23 involved in a traffic collision and listed address 2511 Melvin Avenue, Apartment A,
24 Everett, Washington (hereinafter “LITTLE’s residence”). On July 9, 2020, investigators
25 drove by LITTLE’s residence, and observed the damaged Chevrolet Impala parked in the
26 parking lot, but did not see LITTLE.

27 19. Also on July 9, 2020, investigators interviewed the tipsters at their
28 residence. Investigators showed them the digital images of the suspect that SPD

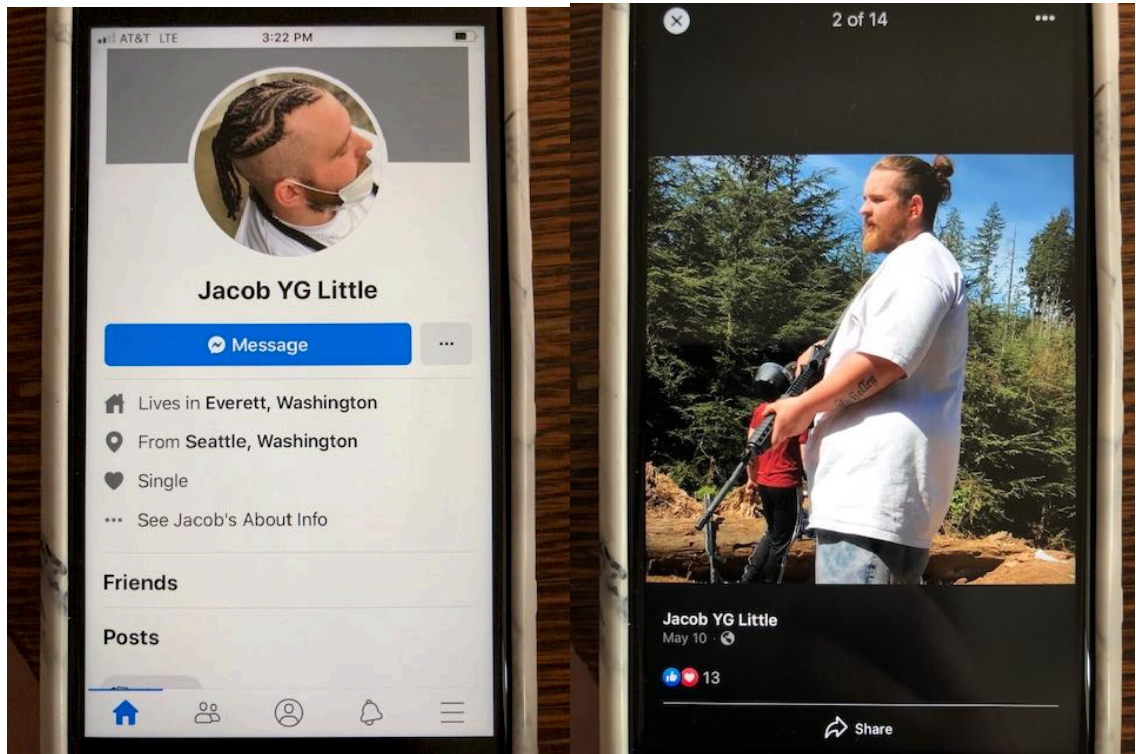
1 | photographers took on May 30, 2020. The tipster and the roommate immediately
2 | identified the person in the images as “Jake Little.” The tipster and the roommate told
3 | investigators they met “Jake Little” in September 2018 while working at Judd and Black
4 | appliance store in Everett, Washington, but neither of them have had any contact with
5 | him in more than a year. The roommate said “Jake Little” was always out shooting and
6 | had invited both to go shooting, but both declined. The tipster provided “Jake Little’s”
7 | Facebook account as “Jacob YG Little” to investigators.

8 | 20. On July 10, 2020, I reviewed photos associated with the Facebook account
9 | “Jacob YG Little.” I compared LITTLE’s driver’s license photo and photos from this
10 | Facebook account. I saw they appeared to depict the same person.

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Top row: photos from “Jacob YG Little” Facebook account

Second row: Jacob LITTLE driver’s license photo

21. Also on July 12, 2020, I reviewed three EPD police reports (EPD 2019-47685, EPD 2019-83082, and EPD 20-28268) referencing LITTLE. I saw in each that LITTLE's address was listed as same as the LITTLE's residence. In EPD 2019-47685 and EPD 2019-83082, I saw officers made in-person contact with LITTLE at LITTLE's residence on May 3, 2019, and July 24, 2019, respectively. I noted from EPD 2019-83082, that LITTLE's father and stepmother also lived at LITTLE's residence. I located Washington licensing records that also associated LITTLE's father and stepmother with LITTLE's residence.

22. On July 12, 2020, investigators reviewed the Facebook account "Jacob YG Little" and observed an image that appeared to depict LITTLE wearing a black slick rain jacket similar to the jacket worn by the suspect. Based on training and experience, investigators were aware that "YG" typically stands for "Yung Gangsta" and is associated with gang member "street" names.

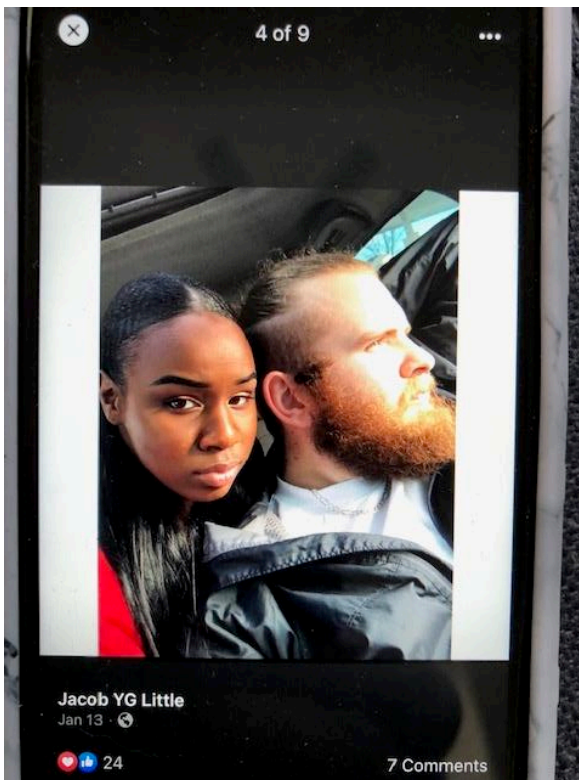


Photo from "Jacob YG Little" Facebook account

23. On July 14, 2020, investigators viewed the posts made to the account of “yg_jacob.” Investigators saw a post from the previous day with an image of a white male that appeared to depict LITTLE.



Snapchat account “yg_jacob” post seen by ATF Special Agent Nelson

24. Investigators also saw two additional posts made to the account “yg_jacob” on July 13, 2020. These posts appeared to indicate that the user was purchasing a new

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1 Remington rifle. Investigators conducted a Google search for gun stores in the Everett,
2 Washington, area. They identified a Sportsman's Warehouse located Everett that
3 appeared to match the posted photos.

4 25. I compared the Snapchat posted photo that appeared to be LITTLE to a
5 photo taken SPD photographers of the suspect on May 30, 2020. I saw the size and shape
6 of the body appeared to be the same. I also noted the similarity of what I could see of the
7 suspect's face with the Snapchat photo of LITTLE.



27 *Left: Photo taken by Photographer Derby. Right: Snapchat post*
28

1 26. Also on July 13, 2020, investigators contacted the Sportsman's Warehouse
2 located at 505 Southeast Everett Mall Way, Suite 1, Everett, Washington, and located an
3 ATF Form 4473 documenting the purchase of a Remington 783 rifle on July 13, 2020, by
4 JACOB. D. LITTLE.

5 27. On three previous days, agents conducted surveillance at the LITTLE's
6 residence. Neither LITTLE nor his registered vehicles were seen.

7 28. On July 15, 2020, investigators conducted surveillance at Cintas Uniform
8 Services, 6400 Merrill Creek Parkway, Everett, Washington, for LITTLE. At
9 approximately 2:00 p.m., they observed a tan Buick LeSabre, bearing Washington license
10 plate 347ZMR (hereinafter "LITTLE's vehicle") pull into the parking lot. Investigators
11 identified the driver as LITTLE. Investigators saw from licensing records that this
12 vehicle was sold on June 23, 2020, to a "Jacob F. Little," who listed the same address as
13 LITTLE's residence.

14 29. Also on July 15, 2020, investigators observed LITTLE take two work
15 breaks in the Cintas parking lot. Investigators noted LITTLE was on his phone for
16 almost the entirety of both breaks.

17 30. Later on July 15, 2020, around 10:00 p.m., investigators followed LITTLE
18 driving LITTLE's vehicle from Cintas to LITTLE's residence.

19 31. On July 20, 2020, the Honorable Judge Tsuchida issued federal search
20 warrants MJ20-449(1), MJ20-449(2), and MJ20-449(3) authorizing the search and
21 seizure of LITTLE's residence, LITTLE's vehicle, and LITTLE's person, as well as
22 LITTLE's cell phones.

23 32. Later on July 20, 2020, members the Violent Offender Task Force (VOT)
24 conducted an arrest operation for LITTLE with probable cause developed by Detective
25 Magan. They located LITTLE's vehicle parked at the Judd & Black Appliance
26 Distribution Center, 3326 Paine Avenue, in Everett, Washington. LITTLE was taken into
27 custody without incident by VOT personnel as LITTLE approached his vehicle. VOT
28 personnel conducted a search incident to arrest of LITTLE.

1 33. After the search, investigators retrieved a black Apple iPhone and
2 LITTLE's car keys that were placed on the driver's side roof of the vehicle. LITTLE was
3 then transported by VOT personnel to the EPD North Precinct. Investigators executed
4 the search of LITTLE's vehicle and located a loaded Glock firearm under the driver's
5 seat. This item was booked with Snohomish County for safe-keeping.

6 34. Later on July 20, 2020, investigators executed the search warrant on
7 LITTLE's residence. After knocking and announcing their presence, they used a key to
8 open the door. No one was present in the residence.

9 35. As the search of the residence commenced, E.L. and S.L., LITTLE's
10 parents, arrived at the residence. LITTLE's parents identified which bedroom was
11 LITTLE's room.

12 36. Investigators collected multiple items of evidence from LITTLE's
13 apartment, to include articles of clothing and documents bearing LITTLE's name.
14 Multiple firearms were located in LITTLE's room, but were not seized.

15 37. Also on July 20, 2020, LITTLE's parents went to the EPD North Precinct
16 and spoke with investigators. Investigators showed LITTLE's parents photographs of the
17 suspect taken on May 30, 2020. Investigators asked them what they saw in the photos.
18 LITTLE's parents were initially quiet. S.L. then began crying and at one point pointed at
19 the photographs and said "That is not the son I raised." Detective Magan interpreted this
20 to mean that S.L. recognized the person in the video as LITTLE and that she was
21 disappointed to see him engaging in such actions. When investigators again asked what
22 they saw in the photos, S.L. said she saw Jacob holding something. Detective Magan
23 released LITTLE, who departed from the precinct with his parents.

24 38. On July 22, 2020, I entered LITTLE's phone, an Apple iPhone in a black
25 case with a Seattle Seahawks logo, into ATF evidence. On the same day, I transferred
26 this item to Washington State Patrol (WSP) investigators to begin the data extraction
27 process.
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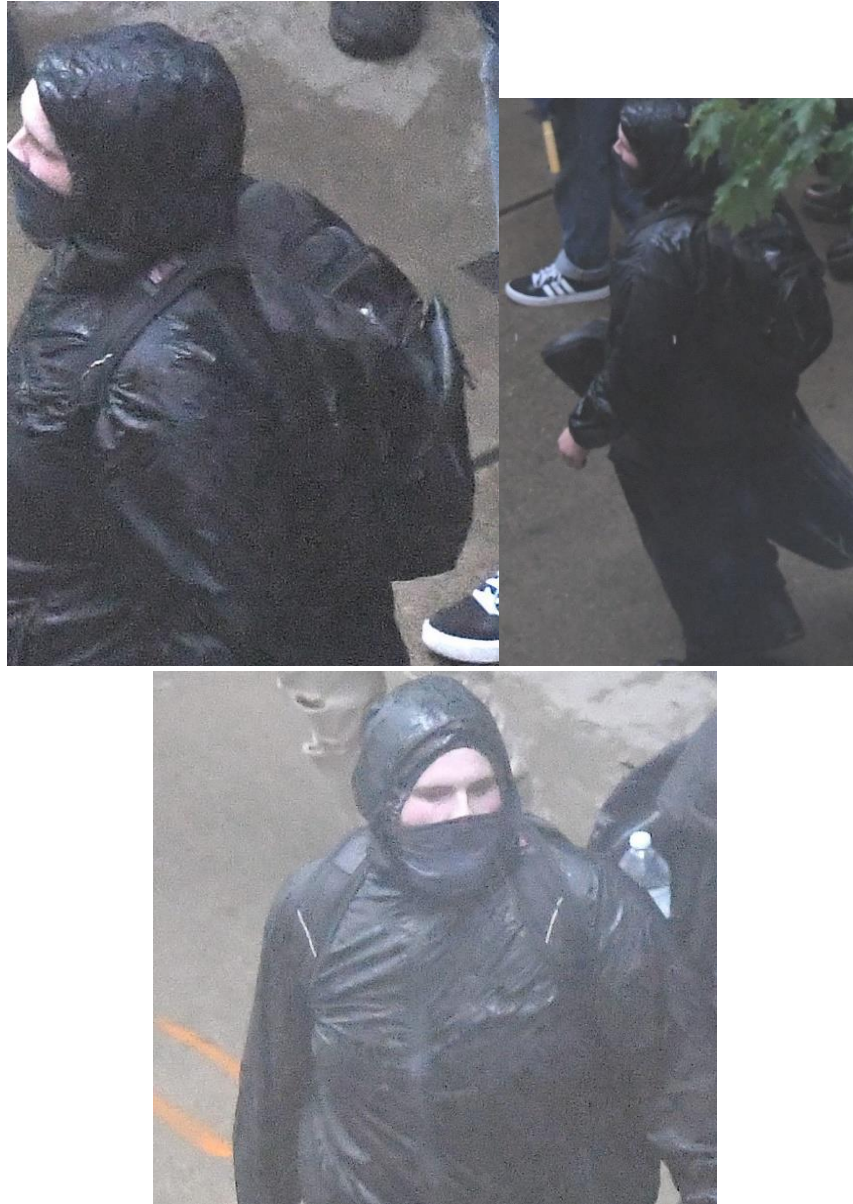
1 39. On July 29, 2020, I completed processing the evidence seized on July 20,
2 2020. I saw three items – a backpack, a jacket, and boots-closely matched the items worn
3 by the suspect on May 30, 2020. I compared photos of these items with photos from the
4 suspect.

5 40. I saw the general size, shape, and color matched the backpack worn by the
6 suspect. I also saw the gray accent stripes and orange patch on the straps matched the
7 backpack worn the suspect.



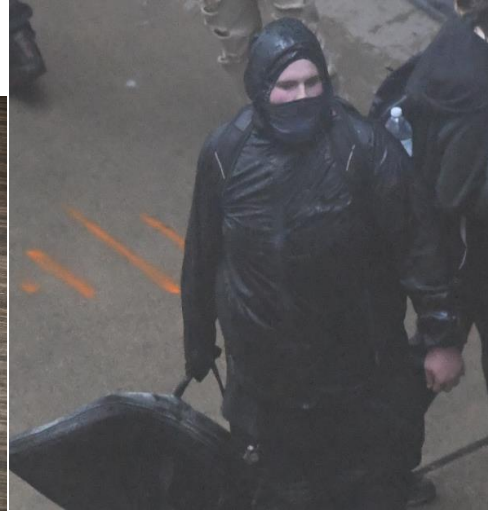
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Photos taken by SA Widmer of Item #4

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Images of suspect's backpack

41. I saw the color and slick material of the jacket matched the jacket worn by the suspect.



Left: Photograph taken by SA Widmer of Item #5. Right: Image of suspect's jacket

42. On the boots, I saw there was an orange stripe above the sole and below the toe of the right boot. I saw this stripe was worn away on the toe of the left boot. I also saw a small white patch on the bottom of the tongue of the right shoe. I saw these characteristics matched the boots worn by the suspect:

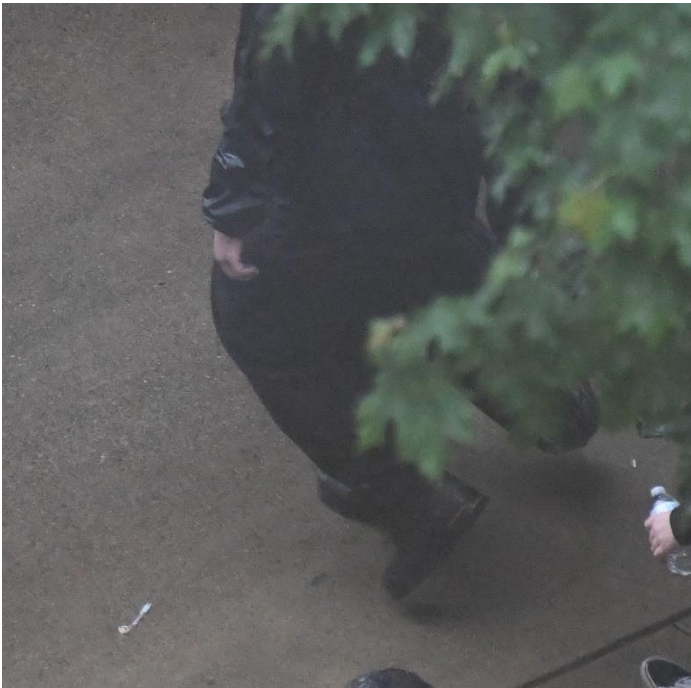
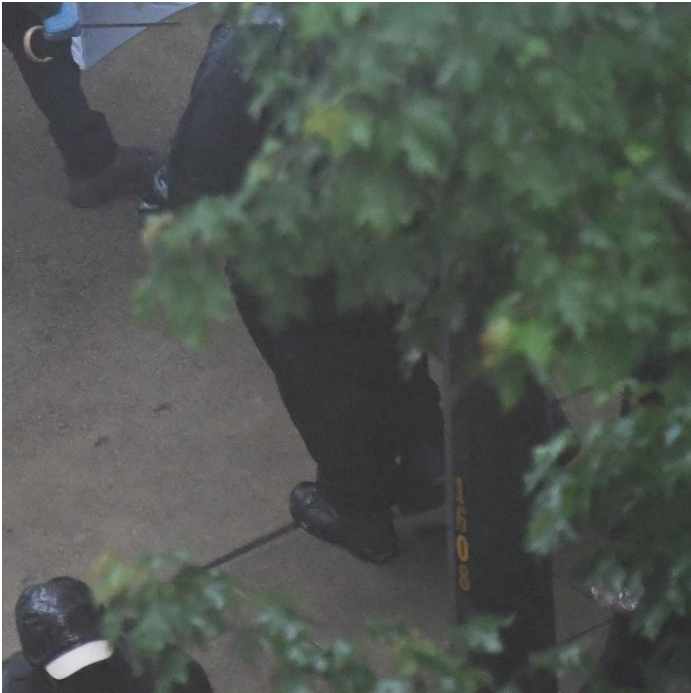
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Photos taken by SA Widmer of Item #6









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Images of the suspect's boots

26 43. On July 27, 2020, I received LITTLE's phone from WSP investigators.
27 They also provided me with a USB flash drive they said contained the extracted data
28

1 from LITTLE's phone. I made working copies and booked the original USB flash drive
2 into ATF evidence.

3 44. On August 4, 2020, I reviewed portions of the cell phone data for
4 LITTLE's phone. I noted the oldest text message was timestamped June 13, 2020 at 1:09
5 p.m. This message read "Verizon Msg: Congratulations on your new phone." Based
6 upon this, I concluded LITTLE likely obtained a new phone around this date, which was
7 approximately two weeks after the SPD issued rifle and suppressor were stolen.

8 45. I saw a series of electronic messages dated May 31, 2020. In these
9 messages, LITTLE discussed attending protests that had taking place the previous night.
10 At one point, LITTLE wrote: "Honestly shit was crazy last night but nobody was getting
11 injured by anybody except for the police everybody who came was standing together."
12 Later in the conversation, LITTLE wrote: "honestly they tried Dr. Kings way it only got
13 them so far now they just try and Malcom X's way and it seems to be working a lot
14 better."

15 46. In another series of electronic messages, also dated May 31, 2020, LITTLE
16 discussed his desire to obtain a video of himself taken the day before of LITTLE "with
17 the laptop." Based upon this, I believe LITTLE was attempting to obtain a video that had
18 been taken of him showing LITTLE using a police laptop to smash a Seattle Police
19 vehicle. As noted above, this video was subsequently posted to LITTLE's SnapChat
20 account.

21 47. I saw another series of electronic messages dated May 31, 2020. In these
22 messages, LITTLE appeared to be attempting to negotiate the sale of the stolen SPD rifle
23 and suppressor. In one message, LITTLE wrote: "I took off the red dot and the flashlight
24 and the sling so I'll let it go for 9. Suppressor still on it."

25 48. I have confirmed with SPD that the stolen Colt rifle and suppressor had a
26 red dot sight and flashlight mounted on the rifle, as well as a rifle sling. Based upon
27 LITTLE's references to the "red dot," "flashlight," "sling" and "suppressor," and the fact
28 that the rifle stolen from the SPD vehicle included a red dot sight, flashlight, sling, and

1 suppressor, as well as the fact that this text conversation took place the day after LITTLE
2 was memorialized on video and in photographs taking a rifle bag from the SPD vehicle, I
3 concluded that this chat was concerning the stolen SPD rifle and suppressor.

4 49. On September 1, 2020, ATF SA Catherine Cole, a certified Interstate
5 Firearms and Ammunition Nexus Expert, who has been trained in the recognition of
6 firearms and ammunition and their origin of manufacture, reviewed materials provided by
7 SPD documenting the Colt rifle and silencer. Based on these materials and as long as the
8 rifle and silencer were consistent with the descriptions provided, SA Cole believed that
9 the Colt rifle and silencer were not manufactured in the state of Washington. Based upon
10 her experience, knowledge and research, it also SA Cole's opinion that the Colt rifle
11 meets the definition of a firearm under Title 18, United States Code, Section 921(a)(3). It
12 is also SA Cole's opinion that, because the Colt rifle and silencer was likely not
13 manufactured in the State of Washington, it therefore must have traveled in interstate
14 commerce if it was received or possessed in the State of Washington.

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CONCLUSION

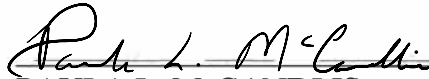
1. Based on the foregoing, I respectfully submit that there is probable cause to believe that JACOB D. LITTLE, has committed the offense of: Possession of a Stolen Firearm, in violation of Title 18, United States Code, Section 922(j).



LEXIE WIDMER, Complainant,
Special Agent, ATF

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit by telephone on this 4th day of September, 2020. The Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 4th day of September, 2020.



PAULA L. McCANDLIS
United States Magistrate Judge